

FCC Docket # 02-33 is predicated on a false premise--namely, that there is such a thing as "broadband Internet access." The terminology flies directly in the face of twenty years of Internet history and technological development, and ignores the real technological underpinnings of the Internet.

The original Internet did not use T1 lines, because there were no T1 lines. The original Internet did not use ISDN, because ISDN itself was in its infancy--the first ISDN standards arrived the same year as the first TCP/IP RFCs, 1984. Yet the Internet has expanded to reach users across these as well as many other media types.

This is possible because the Internet itself is entirely media-independent. Whether the medium is analog modem, ISDN, DSL, cable modem, wireless, T1, Frame-Relay, ATM, or any other communications media, including those yet to be devised, the nature of Internet content and services is IDENTICAL. The only variable is the speed of communications.

Because of this, it is inappropriate to speak of broadband exclusively in terms of Internet use. It is a data communications medium, and while its popular usage currently is to connect to Internet Service Providers, there is no technological or conceptual reason why it should be limited to Internet access. Quite the contrary, the proper role of the FCC in relation to broadband technologies should be to explore why telecommunications carriers are not exploring other uses for broadband technologies; not every data connection is an Internet connection, yet broadband is being treated as if its sole purpose is to connect to the Internet.

Consequently, it is my sincere and informed belief that the FCC should not pursue rulemaking with respect to use of broadband communications to connect to Internet Service Providers, should recognize that such rulemaking falls outside the scope of the FCC's mission, and should focus on rulemaking to ensure that telecommunications carriers (both ILEC and CLEC alike) are encouraged to vigorously explore all potential uses and markets for broadband communications services. Broadband is not the Internet; we must not err by assuming that it is. Cordially,

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